

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

Jorge Wuilson Romero, *on behalf of himself*
and others similarly situated,

Plaintiff,

-v-

Floris Construction, Inc. and Stamatis
Kostikidis, *in his individual and professional*
capacity,

Defendants.

Civ. Case No. 1:16-cv-04282PLC-RLM

ECF Case

Notice of Motion for Default

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the annexed affirmation of Ariadne Panagopoulou, and attached exhibits, and the affidavit of Jorge Wuilson Romero, and all prior papers and proceedings in this case, the Plaintiff, by counsel, move the Court, pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure and Rule 55.2 (b) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, for judgment by default against Defendants FLORIS CONSTRUCTION, INC. and STAMATIS KOSTIKIDIS.

Answering papers, if any, shall be served on the undersigned no later than fourteen days after service of the moving papers in accordance with Local Rule 6.1(b), or at such other times the court may direct.

1 Dated: Astoria, New York
2 March 24, 2017

PARDALIS & NOHAVICKA LLP

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4 By: /s/ Ariadne Panagopoulou
5 Ariadne Panagopoulou (AP-2202)
6 *Attorneys for the Plaintiff*
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CERTIFICATE OF SERVICE

I, Ariadne Panagopoulou, an attorney duly licensed to practice in this Court, hereby certify that on 3/24/2017, I caused to be served upon Defendants Floris Construction, Inc. and Stamatis Kostikidis, Plaintiff's motion for default judgment, with supporting papers, by causing a true copy of the same to be sent by first class mail to the following addresses, which are the Defendants' last known addresses:

1. Floris Construction, Inc.
31-30 41st St
Astoria, NY 11103
2. Stamatis Kostikidis
31-30 41st St
Astoria, NY 11103

Dated: Astoria, New York
March 24, 2017

PARDALIS & NOHAVICKA LLP

By: /s/Ariadne Panagopoulou
Ariadne Panagopoulou (AP-2202)
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